



James B. Wright REC'D TN 14111 Capital Boulevard  
Senior Attorney REGULATORY AUTHORITY Wake Forest, North Carolina 27587-5900  
Telephone: 919-554-7587  
Fax: 919-554-7913

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OFFICE OF THE  
EXECUTIVE SECRETARY

April 18, 2000

Mr. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

00-00339

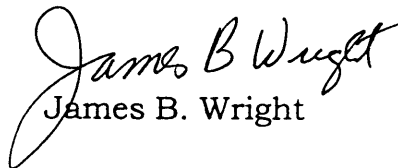
RE: Docket No. 97-07621; Cramming Rule  
UTSE Motion for Extension of Time To Implement Sec.s 4 and 5

Dear Mr. Waddell:

Enclosed are an original and thirteen copies of the Motion of United Telephone-Southeast, Inc. for an extension of time for United to implement sections 4 and 5 of the "Cramming" Rule (Rule 1220-4-2-.58), which we understand is to become effective on May 24, 2000.

If you have questions, please call me or Laura Sykora at 919-554-7323.

Very truly yours,

  
James B. Wright

Enclosures

CC: Dennis Wagner  
Laura Sykora  
Kaye Odum  
Steve Parrott

#18220

POSTED  
4-20-00

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

<b>Proposed Amendments to Rule 1220-4-2-.58</b>	)	
<b>"Billing Requirements for Charges on</b>	)	<b>DOCKET NO. <del>97-07621</del></b>
<b>Consumer's Telephone Bills"</b>	)	

**UNITED TELEPHONE-SOUTHEAST, INC  
MOTION FOR EXTENSION OF TIME**

United Telephone-Southeast, Inc. ("UTSE") hereby requests from the Tennessee Regulatory Authority ("TRA") an extension of time to implement subparts 4 and 5 of TRA Rule 1220-4-2-.58 ("Cramming Rules") until September 1, 2000.

Rule 1220-4-2-.58(4) essentially requires the development of a third party bill blocking service. Rule 1220-4-2-.58(5) requires the filing of tariffs describing the third party bill block service within 180 days of the effective date of the rule. Based on the Rules' effective date of November 26, 1999, tariffs are due to be filed on May 24, 2000; however, the Rule provides that requests for additional time to file a tariff may be filed with the Authority within 180 days of the effective date.

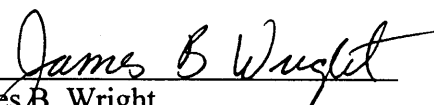
UTSE has been diligently working to fulfill this requirement; however, UTSE will not be able to meet the May 24, 2000 date. Two factors are causing this delay. First, UTSE's programmers determined that the entire toll processing system will require modification. Initially, the programmers' requirements and time estimates contemplated a much less extensive modification to the toll processing system. As a result, two thousand (2,000) programming hours

are required to create the third party bill block service. Programmers are targeting testing in early August with a September 1, 2000 implementation date.

Second, scarce programming resources have slowed the development of the third party bill block service. In the latter half of 1999 and the early part of 2000, programming resources were dedicated to Y2K projects. Programming sources are currently strained by Sprint Corporation's development of its Millennium bill, which is a complete redesign of Sprint's local exchange telephone bill. The Millennium bill will be rolled-out in Tennessee in May 2000 and includes many customer-friendly design features as well as several anti-slamming and anti-cramming devices.

In short, for the reasons stated above, UTSE will be unable to implement sections 4 and 5 of Rule 1220-4-2-.58 by the Rule's effective date of May 24, 2000. Thus, UTSE respectfully requests an extension of time to implement subsections (4) and (5) of Rule 1220-4-2-.58(until September 1, 2000.

Respectfully Submitted,  
United Telephone-Southeast, Inc.

By:   
James B. Wright  
Senior Attorney  
14111 Capital Blvd.  
Wake Forest, NC 27587  
Telephone 919-554-7587

Dated: April 18, 2000